

# Exhibit 4

---

**From:** Zhao, Yanan  
**Sent:** Wednesday, November 1, 2023 2:27 PM  
**To:** Daniel Tishman  
**Cc:** FISH SERVICE Samsung/Netlist 22cv00293; ~Smith, Melissa; tom@gillamsmithlaw.com; bnester@cov.com; aahn@cov.com; jromanow@cov.com; gschmidt@hilgersgraben.com; jhyland@hilgersgraben.com; Winston-Micron-Netlist@winston.com; ce@wsfirm.com; andrea@wsfirm.com; wh@wsfirm.com; ~Doan, Jennifer; jthane@haltomdoan.com; mhornok@haltomdoan.com; mthornberry@haltomdoan.com; #Netlist-Samsung293; jtruelove@mckoolsmith.com; ~Baxter, Samuel  
**Subject:** RE: Netlist v. Samsung, No. 22-cv-293/294 (E.D. Tex.) | Netlist's 30(b)(1) Notices of Deposition to Samsung & Micron

Dan, the meet and confer is set for all parties of the consolidated cases.

We object to Samsung's subpoenas on Mr. Whitley and Mr. Frechette, and will move for a protective order in due course.

Further, Netlist has asked for production of C.D. Cal. transcripts at least on: October 31, October 30, October 29, October 26, and October 25. The parties met and conferred on this last week as well. Your suggestion that Netlist sent a new "after hour" proposal yesterday is wrong. We reserve the right to seek proper remedies from the Court, including extension of existing discovery deadlines and other proper sanctions given Samsung discovery resistance behavior.

Best,  
Yanan

**Yanan Zhao**

*Associate*

**IRELL & MANELLA LLP**

1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

DID: 310-277-1010 | yzhao@irell.com